

KTC:MLM/JK  
F.#2006R00688

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

FILED &  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 28 2007 ★

BROOKLYN OFFICE

- - - - - X

UNITED STATES OF AMERICA

IRIZARRY, J.

I N D I C T M E N T

- against -

CR 07 543

RUSSELL DEFREITAS,  
also known as "Mohammed,"  
KAREEM IBRAHIM,  
also known as "Amir Kareem"  
and "Winston Kingston,"  
ABDUL KADIR,  
also known as "Aubrey Michael  
Seaforth," and  
ABDEL NUR,  
also known as "Compton  
Eversley,"

MANN, M.J.

(18 U.S.C. §§ 32(a)(8),  
37(a), 37(b)(1),  
37(b)(2), 844(n),  
1992(a)(8), 1992(a)(10),  
1992(c)(1), 1992(c)(2),  
2332f(a)(2),  
2332f(b)(1)(D),  
2332f(b)(1)(E),  
2332f(b)(2)(A),  
2332f(b)(2)(C)  
2332f(c), 2 and  
3551 et seq.)

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Attack Public Transportation System)

1. On or about and between January 1, 2006 and June 2, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem" and "Winston Kingston," ABDUL KADIR, also known as "Aubrey Michael Seaforth," and ABDEL NUR, also known as "Compton Eversley," together with others, did knowingly and intentionally conspire to unlawfully deliver, place, discharge

and detonate an explosive and other lethal device in, into and against a public transportation system, to wit: John F. Kennedy International Airport, and an infrastructure facility, to wit: fuel tanks and pipelines at John F. Kennedy International Airport, with the intent to cause death, serious bodily injury and extensive destruction of such system and facility, where such destruction was likely to result in major economic loss, in violation of Title 18, United States Code, Section 2332f(a)(1).

(Title 18, United States Code, Sections 2332f(a)(2), 2332f(b)(1)(D), 2332f(b)(1)(E), 2332f(b)(2)(A), 2332f(b)(2)(C), 2332f(c) and 3551 et seq.)

COUNT TWO

(Conspiracy to Destroy Building by Fire or Explosive)

2. On or about and between January 1, 2006 and June 2, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem" and "Winston Kingston," ABDUL KADIR, also known as "Aubrey Michael Seaforth," and ABDEL NUR, also known as "Compton Eversley," together with others, did knowingly and intentionally conspire to maliciously damage and destroy, by means of fire and an explosive, a building and other real property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: buildings and property at John F. Kennedy International Airport,

in violation of Title 18, United States Code, Section 844(i).

(Title 18, United States Code, Sections 844(n) and 3551 et seq.)

COUNT THREE

(Conspiracy to Attack Aircraft and Aircraft Materials)

3. On or about and between January 1, 2006 and June 2, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem" and "Winston Kingston," ABDUL KADIR, also known as "Aubrey Michael Seaforth," and ABDEL NUR, also known as "Compton Eversley," together with others, did knowingly and intentionally conspire to place and cause to be placed a destructive device and substance in, upon and in proximity to, and otherwise make and cause to be made unworkable and unusable, an aircraft in the special aircraft jurisdiction of the United States and a civil aircraft used, operated and employed in interstate, overseas and foreign air commerce, and parts and other materials used and intended to be used in connection with the operation of such aircraft, where such placing and causing to be placed and such making and causing to be made were likely to endanger the safety of such aircraft, in violation of Title 18,

United States Code, section 32(a)(2).

(Title 18, United States Code, Sections 32(a)(8) and 3551 et seq.)

COUNT FOUR

(Conspiracy to Destroy International Airport Facilities)

4. On or about and between January 1, 2006 and June 2, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem" and "Winston Kingston," ABDUL KADIR, also known as "Aubrey Michael Seaforth," and ABDEL NUR, also known as "Compton Eversley," together with others, did knowingly and intentionally conspire to unlawfully use a device, substance and weapon to destroy and seriously damage the facilities of an airport serving international civil aviation, to wit: John F. Kennedy International Airport, and disrupt the services of said airport, where such an act was likely to endanger safety at said airport, in violation of Title 18, United States Code, Section 37(a)(2).

(Title 18, United States Code, Sections 37(a), 37(b)(1), 37(b)(2) and 3551 et seq.)

COUNT FIVE

(Conspiracy to Attack Mass Transportation Facility)

5. On or about and between January 1, 2006 and June 2, 2007, both dates being approximate and inclusive, within the

Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem" and "Winston Kingston," ABDUL KADIR, also known as "Aubrey Michael Seaforth," and ABDEL NUR, also known as "Compton Eversley," together with others, did knowingly and intentionally conspire to set fire to and place a destructive substance and device in, upon and near a terminal, structure, supply and facility used in the operation of, and in support of the operation of, a mass transportation vehicle, to wit: fuel tanks, pipelines and buildings at John F. Kennedy International Airport, without lawful authority and permission, and with intent to, and knowing and having reason to know that such activity would likely, disable and wreck a mass transportation vehicle used, operated and employed by a mass transportation provider, in violation of Title 18, United States Code, Section 1992(a)(4)(B).

(Title 18, United States Code, Sections 1992(a)(10), 1992(c)(1), 1992(c)(2) and 3551 et seq.)

COUNT SIX

(Surveillance of Mass Transportation Facility)

6. On or about and between September 1, 2006 and June 2, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," and ABDUL KADIR, also known as "Aubrey Michael Seaforth," together with others, did knowingly, intentionally and without lawful authority and


permission surveil, photograph, videotape, diagram and otherwise collect information with the intent to plan and assist in planning an act described in Title 18, United States Code, Section 1992(a)(4)(B), to wit: setting fire to and placing a destructive substance and device in, upon and near a terminal, structure, supply and facility used in the operation of, and in support of the operation of, a mass transportation vehicle, to wit: fuel tanks, pipelines and buildings at John F. Kennedy International Airport, without lawful authority and permission, and with intent to, and knowing and having reason to know that such activity would likely, disable and wreck a mass transportation vehicle used, operated and employed by a mass transportation provider.

(Title 18, United States Code, Sections 1992(a)(8), 1992(c)(1), 1992(c)(2), 2 and 3551 et seq.)

A TRUE BILL

---

FOREPERSON

  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF NEW YORK**

**CRIMINAL DIVISION**

**THE UNITED STATES OF AMERICA**

vs.

**RUSSELL DEFREITAS, also known as "Mohammed,"  
KAREEM IBRAHIM, also known as "Amir Kareem" and "Winston Kingston,"  
ABDUL KADIR, also known as "Aubrey Michael Seaforth," and  
ABDEL NUR, also known as "Compton Eversley,"**

**Defendants.**

**INDICTMENT**

(Title 18, United States Code, Sections 32(a)(8), 37(a), 844(n), 1992(a)(8), 1992(a)(10), 2332f(a)(2), 2332f(c), 2 and 3551 et seq.)

*A true bill.*

*Foreman*

*Filed in open court this*

*day,*

*of*

*A.D. 19*

*Clerk*

*Bail, \$*

*Marshall Miller, AUSA (718) 254-6421*